

## NOTICE REGARDING THE PROCESSING OF DATA RELATED TO THE MANAGEMENT OF THE MOBILITY PATH OF STUDENTS, RECENT GRADUATES, AND STAFF MEMBERS

### CONTEXT

To facilitate the mobility of students, recent graduates, and staff members, the University of Namur establishes exchange partnerships with educational institutions and concludes individual internship, training, or teaching agreements with third-party organizations. In these contexts, the University of Namur allows registered students to undertake part of their studies or an internship at another institution (outgoing mobility). The University also welcomes students from other institutions under mobility programs (incoming mobility).

Similar opportunities exist for staff training or teaching projects (incoming and outgoing mobility). The activity encompasses all operations involved in managing incoming and outgoing mobility requests for students, recent graduates, and staff, and coordinating their reception at the University (incoming mobility) or the third-party institution (outgoing mobility). The use of data generated during regular student registration at UNamur and the course of studies is not described in this information document.

### CATEGORIES OF PERSONAL DATA PROCESSED AND PURPOSES OF USE

For this activity, the University of Namur processes data in the following categories:

- General identification data (category including the following types of data: last name, first name, postal address, email addresses, copy of identity card, identity photograph, phone number, etc.)
- Identity documents (copies of identity documents/passports)
- Identifiers assigned by public authorities (category including the following types of data: social security number passport number, identity/residence card number, national register number, driving license number, vehicle registration, etc.)
- Identifiers assigned by UNamur (category including the following types of data: student number, internal registration number, eID for internal resources access, access card identifiers, student card number, etc.)
- Personal characteristics data (category including the following types of data: date of birth, gender, place of birth, marital status, nationality, residence status in Belgium, mother tongue, spoken languages, driving license possession, etc.)
- Family situation data (category including the following types of data: marital status, data related to parents, guardians, spouses, household composition, children, etc.)
- Social data (category including the following types of data: data related to study grants from the Wallonia-Brussels Federation, social assistance, family allowances, scholarships from the University or another entity, etc.)
- Data related to student and PHD registrations (category including the following types of data: data related to the registration file, lightening [1st & 2nd Cycle], study cycle of registration [1st & 2nd & 3rd cycle], joint degree, study code and study domain [1st & 2nd cycle & continuing education], academic grade code & habilitation [ARES], isolated courses", PAE credits" [1st cycle & 2nd cycle & continuing education], "PAI" - individualized support program, types of bridge program, anticipated teaching units ("UEs"), recognition of prior learning & credits, granted exemptions, exam registrations, fraudulent student status, prerequisites such as mastery of the French language [exam date]), etc.);
- Academic and school career data (category including the following types of data: academic career data, annual student program - followed teaching units, grades, credits, mentions, obtained diplomas, diploma issuance country, jury opinions, disciplinary decisions and appeals, final study work, completed internships, etc.)
- Student mobility data (category including the following types of data: data related to participation in a mobility program (e.g., Erasmus), dates, originating or destination institution, etc.)

- Authentication data (category including the following types of data: login, passwords, password modification date, token, etc.)
- Connection and logging data (category including the following types of data: connection dates and times, performed operation type, user identifier, IP addresses, accessed data type, etc.)
- Specific needs data (category including the following types of data: data related to specific needs in the support file, support plan, granted accommodations, etc.)
- Bank and financial data (category including the following types of data: bank account number, IBAN code, VAT details, etc.)
- Payment data (category including the following types of data: transaction data, payment amount, payment date, debtor, creditor, transaction purpose, etc.)
- Insurance data (category including the following types of data: contract type, coverage date, insured amount, insurance interventions, etc.)
- Professional data (category including the following types of data: data related to profession or professional activities, function in an external entity, professional affiliations, etc.)
- Employment data (category including the following types of data: employer, occupied function title, grade, status (academic, scientific, ATG), status track, employee status, employment contract type, contract validity duration, work regime, occupation rate, nomination decisions, previous functions, etc.)
- Professional experience and skills data (category including the following types of data: CV, language skills, previous experiences, references, etc.)
- Expense reimbursement data (date and purpose of expenses, supporting documents, etc.)
- Staff training data (category including the following types of data: training registrations, training needs details specific to the function, received training, obtained qualifications, acquired skills, etc.)
- Absence justification data (category including the following types of data: attestation dates, reason, etc.)
- Registration data (category including the following types of data: registration date, registration purpose, etc.)
- Internship data (category including the following types of data: internship organization and purpose, date, location, reports, etc.)
- Sanction imposition data (category including the following types of data: circumstances, dates, observed facts, imposed sanction, taken measures, etc.)
- Housing allocation and use data (category including the following types of data: housing allocation dates and purpose, incidents related to occupation or end of occupation, etc.)
- Declaration of honor (issued by the partner institution regarding the financial conditions met by the mobility candidate)

These data are used to:

- Manage the reception, processing, and follow-up of mobility requests from students, recent graduates, and staff. This includes:
  - Technical management of access rights to the web platform through which requests are submitted and processed.
  - Management of student registration processes in the context of incoming mobility.
  - Verification of conditions required to benefit from the program.
  - Verification of conditions required to work in an environment requiring risk analysis (e.g., in a laboratory).
- Manage the allocation of scholarships. This includes:

- Verification of conditions to obtain the grant and, if applicable, an increased grant for students with fewer opportunities or specific needs.
  - Management of the University of Namur's obligations regarding fund justification (data communications on program beneficiaries via funders' platforms and reporting based on aggregated data).
- Manage the execution of exchange agreements with partner educational institutions. This includes:
  - Data exchange concerning students, the relevant study or internship program, and communication of evaluation results (study programs, internships, grade and internship evaluations).
  - Coordination with the host institution for student/staff teaching support (outgoing mobility) (specific needs, housing offer, etc.).
  - Coordination with the University of Namur's internal services to ensure students/staff can benefit from university services (housing, specific needs, etc.).
- Manage the conclusion and execution of individual internship and training agreements. This includes:
  - Management of reception and coordination with internal services to ensure students/staff can benefit from university services (housing, specific needs, etc.).
  - Coordination with the host institution for student/staff support (outgoing mobility).
- Evaluate mobility activities. This includes:
  - Conducting statistics to gain better knowledge of the activity and establishing quantitative and qualitative reports for the University of Namur authorities and funders (aggregated data).
  - Evaluating support needs, notably through statistical analyses.

## **BASIS OF LAWFULNESS OF DATA PROCESSING**

The processing activity is carried out because it is necessary to perform a public interest mission related to education (Article 6, 1, e) of the GDPR). The Landscape Decree of 7 November 2013 defining the landscape of higher education and the academic organization of studies provides that the teaching mission is part of an essential dimension of international collaborations and exchanges (cf. notably Article 3, §1, 6°).

## **PROCESSING OF SPECIAL CATEGORIES OF DATA**

In pursuing the aforementioned purposes, the University of Namur also processes data in the following special categories:

- Data on a certificate issued by a health professional.
  - The processing of data in this special category is justified because it is necessary for the execution of obligations and the exercise of rights specific to the University of Namur or the concerned person in terms of labor law, social security, and social protection (Article 9, 2, b) of the GDPR).
  - These data are processed to validate that a person as a worker or student intern meets the conditions to work in an environment exposing to risks (e.g., in a laboratory) under the legislation on well-being at work.

- Health data justifying accommodations for the concerned student.
  - The processing of data in this special category is justified because it is necessary for important public interest reasons (Article 9, 2, g). The support of students with specific needs is subject to the decree of 30 January 2014 on inclusive education for students with disabilities.

## **CATEGORIES OF DATA SUBJECTS**

The categories of persons whose data are processed for the activity's needs are:

- Registered students.
- Family members or persons indicated by the concerned person.
- Staff members.
- Visitors (staff and recent graduates from other institutions).
- Mobility candidates.

## **DATA SOURCES**

The data used in the processing activity come from the following sources:

- The person themselves provided them.
- The data are generated by the person's activity.
- The data are provided by a third party or come from a third-party database.
- The data are included in a University database.
- The data may indeed be provided to us by partner institutions for the organization of the student's or staff member's mobility program.

## **DATA RECIPIENTS**

The data are processed only by the University personnel and services for the activity's needs. The internal data recipients mainly belong to the following categories:

- Administrative services personnel.
- Faculty and department personnel.
- Research institutes and centers personnel.

The external data recipients belong to the following categories:

- Educational partners.
- Third-party organizations for training and internships.
- Funders.
  - When exchange programs are funded by funders (e.g., the European Union for the "Erasmus +" program or the Wallonia-Brussels Federation for the "Belgica" and "FAMES" programs), data on program beneficiaries are communicated to these organizations for auditing the use of funds benefiting the University of Namur (e.g., due to the allocation of scholarships to University of Namur students).
- External service providers.

- The external occupational health service of UNamur for mandatory health evaluation under the Well-being at Work Code.

## **PROCESSING CHARACTERISTICS**

The retention period is determined based on the necessity criterion to retain data for operational needs according to their use purpose. The data are retained for the duration necessary for organizing mobility and must be kept for at least 7 years after the end of the concerned academic year for auditing purposes by third-party organizations providing exchange program funding.

In the context of the processing activity, the University of Namur is required to transfer personal data outside the territory of the European Economic Area, to the territory of the partner establishments with which the mobility programmes are organised, which are not necessarily subject to a legal framework offering a level of protection in terms of personal data equivalent to that of the RGPD.

The communication of student data is carried out within the framework of an agreement concluded with the partner institution which defines the procedures for the participation of incoming and/or outgoing students in the exchange programme. Depending on the country concerned, the transfer is based on the following grounds and guarantees:

- The transfer takes place to one or more countries that have been recognised by the European Commission as offering an adequate level of protection.
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person.

In the context of the processing activity, the University of Namur transfers personal data outside the European Economic Area to the territories of partner institutions with which mobility programs are organized. This transfer is necessary for the conclusion or execution of a contract in the interest of the data subject between the data controller and another natural or legal person. The communication of student data is carried out under an agreement concluded with the partner institution defining the participation modalities of incoming and/or outgoing students in the exchange program.

## **RIGHTS OF THE DATA SUBJECTS**

Data subjects have rights described on the page <https://www.unamur.be/en/privacy-policy>. Any request or question related to the files processed by this service can be addressed to [international-mobility@unamur.be](mailto:international-mobility@unamur.be).